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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 Pamela Caravantes and Jose Caravantes
17 Pena,

18 Plaintiffs,

19 v.

20 Alejandro Mayorkas, United States Secretary
21 of Department of Homeland Security; Ur
22 Jaddou, Director of United States Citizenship
23 and Immigration Services; Lola Parocua, Las
24 Vegas Field Office Direction, U.S.C.I.S.;
25 John Doeck Adjudication Officer for Las
26 Vegas Field Office of U.S.C.I.S.,

27 Defendants.

28 Case No. 2:23-cv-00877-EJY

29 **Stipulation to Extend Deadline for**
30 **Defendants to File a Responsive**
31 **Pleading**

32 **(First Request)**

33 Plaintiffs, Pamela Caravantes and Jose Caravantes Pena, and the United States of
34 America, on behalf of Defendants, through counsel, hereby stipulate and jointly move the
35 Court to extend the time for Defendants to file an answer or other responsive pleading to
36 Plaintiffs' amended complaint by an additional **30 days**. This is the first request to extend
37 this deadline and is based on the following:

38 1. On June 19, 2023, Plaintiffs filed their amended complaint (ECF No. 6).

39 Plaintiffs request, among other relief, that the Court compel Defendants to reset Jose's
40 interview before an immigration officer/examiner and make a new decision to approve or
41 deny his immigrant visa and precluding the officer from denying his visa based upon 8

1 U.S.C. § 1182(a)(2)(C)" and "enter a Declaratory Judgment that the denial decision was
2 invalid and that 8 U.S.C. § 1182(a)(2)(C) is inapplicable to Jose." (ECF No. 6 at 6).

3 2. Defendants' answer or other responsive pleading is currently due August 22,
4 2023.

5 3. Since the filing of the amended complaint, the agency has reopened
6 Plaintiff's I-485 application and requested additional documentation from Plaintiff.

7 4. The agency may take further action as to Plaintiff's claims. The reopening of
8 the application and upcoming agency actions may resolve some, or all, of the issues raised
9 in Plaintiffs' amended complaint.

10 5. Accordingly, the parties request that the Court extend the time for
11 Defendants to answer or otherwise plead by 30 days. Defendants responsive pleading
12 would then be filed on or before **September 21, 2023**, which is 30 days from the current
13 responsive pleading deadline.

14 Respectfully submitted this 22nd day of August 2023.

15
16 LAW OFFICES OF ANTHONY D.
GUENTHER, ESQ.

17
18 /s/ Anthony D. Guenther
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17 JASON M. FRIERSON
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18 /s/ Skyler H. Pearson
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20 *Attorneys for Federal Defendants*

23 IT IS SO ORDERED:

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25
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: August 22, 2023